

***United States District Court***  
**DISTRICT OF NEW HAMPSHIRE**

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**United States of America**

**v.**

**Ian Freeman**

**CASE NUMBER: 1:21-cr-000041**

**ASSENTED TO MOTION TO EXTEND DEADLINE DATES FOR OBJECTIONS TO  
THE PRESENTENCE INVESTIGATION REPORT**

***NOW COMES*** the defendant, Ian Freeman, by and through counsel, Mark L. Sisti, Esq. and respectfully moves this Honorable Court to extend the deadline to object to the Presentence Investigation Report with regard to this matter.

As grounds for and in support of this request, the Defendant states as follows:

1. The current deadline to file objections is March 17, 2023.
2. Due to the complex and unique calculations regarding actionable currency totals involving in loss amounts, both parties request an extension of time in which to object/respond to the presentence investigation report.
3. Defense counsel has contacted Georgiana MacDonald, Esq. of the U.S. District Attorney's office, and she assents to the granting of this motion.

***WHEREFORE*** the Defendant respectfully requests that this Honorable Court grant this motion to extend the deadline to file objections to the Presentence Investigation Report for forty-five (45) days.

Respectfully Submitted,

Dated: March 10, 2023

/s/ Mark L. Sisti, Esq.  
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### **CERTIFICATION**

I hereby certify that on this 10<sup>th</sup> day of March 2023 that a copy of the foregoing Assented to Motion to Extend Deadline Dates for Objections to the Presentence Investigation Report has been forwarded to Seth Aframe, Esq. and Georgiana MacDonald, Esq of the U.S. District Attorney's Office, through the Court's electronic filing system.

/s/ Mark L. Sisti, Esq.  
Mark L. Sisti, Esq.